Case 1:12-cv-01596-AKH Document 762 Filed 04/22/15 Page 1 of 1

KOHN, SWIFT & GRAF, P.C.

ONE SOUTH BROAD STREET, SUITE 2100

PHILADELPHIA, PENNSYLVANIA 19107-3304

E-MAIL: RSWIFT@KOHNSWIFT.COM

HAROLD E. KOHN

(215) 238-1700
TELECOPIER (215) 238-1968
FIRM E-MAIL: info@kohnswift.com
Web Site: www.kohnswift.com

OF COUNSEL MERLE A. WOLFSON LISA PALFY KOHN

DOUGLAS A. ABRAHAMS *
WILLIAM E. HOESE
STEVEN M. STEINGARD *
STEPHEN H. SCHWARTZ†
CRAIG W. HILLWIG
BARBARA L. MOYER†

JOSEPH C. KOHN

ROBERT A. SWIFT

GEORGE W. CRONER ROBERT J. LAROCCA DENIS F. SHEILS+0

* ALSO ADMITTED IN NEW YORK * ALSO ADMITTED IN NEVADA * ALSO ADMITTED IN NEW JERSEY

> Honorable Alvin K. Hellerstein Room 1050 United States Courthouse 500 Pearl Street New York, NY 10007

April 22, 2015

USDC SUNY
DOCUMENT
ELECTRONICALLY FILED
DOG#:
DATE FILED: 4/27/15

So ar areal 4-24-15 Atapac

Re:

Aldo Vera v. The Republic of Cuba, No. 12 Civ. 1596 Pending BBVA Motion for Reconsideration

Dear Judge Hellerstein:

I am one of the attorneys representing plaintiff Aldo Vera, Jr. in the above matter and am admitted pro hac vice. Garnishee Banco Bilbao Vizcaya Argentaria S.A.'s ("BBVA") Motion for a Stay of Discovery Pending Appeal (ECF # 748 -750) is pending before the Court. By Stipulation and Order entered April 13, 2015 (ECF # 761), your Honor extended Vera's time to respond to the Motion until today, April 22, 2015. Counsel for BBVA and I are engaged in discussions which may have a material impact on the Motion. Accordingly, counsel for BBVA and I jointly request that the Court extend Vera's time to respond to the Motion until April 29, 2015, and BBVA's time to furnish full and complete answers to the information subpoena to May 18, 2015.

Respectfully yours,

Robert A. Swift

RAS/yr Enclosure

Cc w/enc. via ECF: Kenneth Caruso, Esq.